ANCHOR QEA

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July 29, 2016

Douglas Fischer
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866

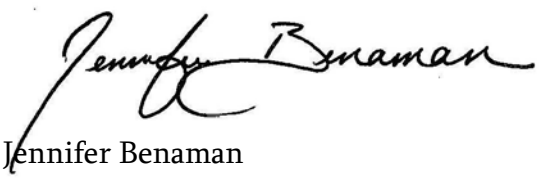
Re: August 10, 2010 Confidential Business Information Claim
Project Number: GENnrd.01:114

Dear Doug:

This letter is to inform you that the Confidential Business Information (CBI) claim invoked by Anchor QEA on a August 10, 2010 transfer of information to the U.S. Environmental Protection Agency (USEPA) is no longer needed. Anchor QEA withdraws this claim for the files referenced in our August 10, 2010 transmittal (re-attached here for clarification). Anchor QEA's withdrawal of this specific CBI claim is not intended to affect other CBI claims asserted with respect to other submittals, and we reserve all rights with respect to those submittals.

Please let us know if you have any questions.

Best regards,



Jennifer Benaman
Anchor QEA, LLC
Attachments – August 10, 2010 Transmittal

ANCHOR QEA

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TRANSMITTAL

To:	Doug Garbarini U.S. EPA 290 Broadway, 19th Floor New York, New York 10007	**From:**	Jennifer Benaman
		Date:	August 10, 2010
Re:	Scenario Files for the Upper Hudson River	**Project:**	GENprw.02 Task 253

Number	Description
2	Hard drives containing scenario files for the Upper Hudson River Modeling System

Comments:

Please find enclosed the above referenced hard drives containing the Upper Hudson River model scenario files. Included are model inputs, outputs, processing programs, and instructions for setup and execution for the following simulations (2009 to 2059):

- Monitored Natural Recovery (no dredging in any year, including 2009)
- Phase 1 + Phase 2 dredging using resuspension rates at the point of dredging of 0%, 1%, 3%, and 5% at the point of dredging

The transmitted simulations are those used in the analyses presented in General Electric's June 28, 2010 "Allowable Load Memo." Please note the following technical details regarding these simulations:

- As described in the Allowable Load Memo, 2009 dredging is simulated using the Phase 1 data describing dredging location and amount of PCB and sediment removed each day (i.e., the "bucket files"). The Phase 1 PCB mass removed is from calculations described in Appendix H of GE's March 8, 2010 Phase 1 Evaluation Report. Phase 2 dredging is based on a schedule for removal of the targeted PCBs in 5 years within 2.4 MMcy of sediment. The mass of PCBs in Phase 2 was set by increasing the mass estimated during the dredging delineation using the design data by 25% to account for uncertainty.

- For all dredging simulations, the PCB and TSS concentrations entering Reach 7 (i.e., the downstream boundary for Reach 8) for May 15 to December 17, 2009 are specified using the Remedial Action Monitoring Plan (RAMP) data at the Thompson Island Far-Field station.
- As the result of a logic fault, the 1%, 3%, and 5% release simulations in this transmittal introduce "clean solids" at the point of dredging on days during 2011 to 2015 that dredging was not occurring at a particular cell. The time step and load series in the point source input files were misaligned such that solids load was introduced between dredging periods for each dredging cell. Thus, these simulations over-represent solids release but correctly represent PCB release. Subsequent to conducting these simulations, the input files were modified and the extra solids load has been eliminated. Subsequent simulations will have matched sediment and PCB resuspension.
- Dredging simulations for percent release rates greater than 0% include paired model runs for the period of dredging. One run has normal (reversible) partitioning in the water column while the other run has partitioning set so that the PCBs effectively remain with the particulate matter to reflect resistantly bound PCBs that cannot desorb on the time scale that resuspended solids remain in the water column. The results of these runs are averaged to reflect a 50/50 split between the reversible and resistant phases in the water column. The resistant phase is not simulated in the sediment bed because the residence time of particles in the bed is presumed to allow attainment of sorption equilibrium.
- Because of the method used to account for resistantly bound PCBs during dredging, specific procedures described here are necessary to estimate water column fish exposures during dredging. Specific instructions for developing water column fish exposure concentrations for the resuspension runs are provided in the FDCHN readme file. In brief, total water column tri+ PCB concentrations for both the reversible and resistantly bound PCB simulations were averaged, and then dissolved and particulate concentrations were then calculated from partitioning equations.

To run the simulations for the different models, please refer to the readme files in the following directories of the second hard drive.

1. Hydrodynamic/Sediment Transport:
   Z:\MODEL\EFDC\ReadMe_Hydro_Sedtran_Transfer_20100810.docx
2. Fate and Transport:
   R8 2009 model scenarios:
   Z:\MODEL\EFDC\PREPROCESS\Chemfate\2009_dredging\R8\dred_2009_chemfate_setup_r8_4class_model_level1
   Projection and Reaches 7-1 2009 model scenarios:
   Z:\MODEL\EFDC\PREPROCESS\Chemfate\Projections\L2_Opt_Processor_README.docx
3. Bioaccumulation:
   Z:\FDCHN\FDCHN_README_081010.docx

Please note that all IDL decks assume that the June 8, 2010 hard drive we previously transferred is mapped to your network (or computer) as the "Y:" drive. This enclosed hard drive is in eSATA format, which should allow for quicker reading of the coupling files directly from the hard drive for the simulation of the fate and transport model.

The table below provides a general overview of the contents of the two hard drives.

Directory/Subdirectory	Description	Comments
Hard Drive 1 (This hard drive contains only model output from the scenario runs. Note that there was not enough room to include the 2010-2059 MNA output, so these output files are in the root directory of Hard Drive 2)		
R8_2009	Reach 8 2009 model output: MNA, 0%, 1%, 3%, and 5% resuspension	See example log file (GENmod_R8_PS17_2009_dredging.csv) at Z:\MODEL\EFDC\PREPROCESS\Chemfate\2009_dredging\R8
LowerReach_2009	Reach 7-1 2009 model output: MNA, 0%, 1%, 3%, and 5% resuspension	See example master control file at Z:\MODEL\EFDC\INPUT_FILES\IDL_CONTROL_FILES\SPACE_TIME\MASTER
PS##	Reach 8-1 2010-2059 model output: 0%, 1%, 3%, and 5% resuspension	See example master control file

Directory/Subdirectory	Description	Comments
Hard Drive 2 (This is referred to as the Z: drive in this transmittal as well as in any related IDL deck or batch file)		
Chemfate_Model_Run\	Reach 8-1 2010-2059 model output: MNA	See example master control file
MODEL\EFDC		
→Hydro_Sedtran_Model_Inputs (Note: → means sub-folder under MODEL\EFDC\)	This folder contains additional input files needed for Reach 8-1 2009 and 2010-2059 model runs. A readme file regarding to model inputs is included.	All other relevant inputs in the simulations are available in the hard drive transferred on June 8, 2010 (included in the sub-folders: Y:\MODEL\EFDC\INPUT_FILES\ on that drive).
→Hydro_Runs_2009	This folder is organized by reach (Reaches 8 through 1). Each reach sub-folder contains output files and hydro-coupling files from hydrodynamic simulations for 2009 period	It is NOT recommended using the batch or shell files in this folder to re-produce the hydrodynamic simulations. To re-produce or modify the hydrodynamic simulations, please refer to readme file for model setup provided in this drive: Z:\MODEL\EFDC\ReadMe_Hydro_Sedtran_Transfer_20100810.docx.
→Sedtran_Runs	This folder is organized by reach. Each reach sub-folder contains two sub-folders "4Class_2009" and "4Class_2011-2015" for phase-1 and phase-2 sediment transport simulation.	For details, please refer to readme file for model setup provided in this drive: Z:\MODEL\EFDC\ReadMe_Hydro_Sedtran_Transfer_20100810.docx.
→Hydro_Sedtran_Preprocess	There are two sub-folders: → Setup_ Hydro_runs_Yr2009 → Setup_Sedtran_runs It is about seting up hydro and sedtran model runs. IDL preprocessors are provided in each sub-folders.	For details, please refer to readme file for model setup provided in this drive: Z:\MODEL\EFDC\ReadMe_Hydro_Sedtran_Transfer_20100810.docx.
→INPUT_FILES	All input files needed for Reach 8-1 2009 and 2010-2059 model runs	The input files contained in this transmittal should be copied over to the June 8th transmittal directory structure to setup 2009 and projection chemfate model runs.
MODEL\EFDC\PREPROCESS\CHEMFATE		
→2009_dredging\R8	IDL pre-processor for Reach 8 2009 model scenarios	See readme (R8_2009_dredging_processor_README.docx) at Z:\MODEL\EFDC\PREPROCESS\Chemfate\2009_dredging\R8
→Projections\L2_Optimized_Processor	IDL pre-processor for Reach 7-1 2009 model scenarios and Reach 8-1 2010-2059 model scenarios	See readme (L2_Opt_Processor_README.docx) at Z:\MODEL\EFDC\PREPROCESS\Chemfate\Projections

Directory/Subdirectory	Description	Comments
MODEL\EFDC\POSTPROCESS\CHEMFATE		
→Projection	IDL post-processor for Reach 8-1 2009 and 2010-2059 model scenarios	See readme (Projection_PostProcessor_README) at Z:\MODEL\EFDC\POSTPROCESS\Chemfate\Projection
MODEL\FDCHN\		
→IDL_Processors	IDL post-processors updated to process fate model output for FDCHN input for Reach 8-1 2009 and 2010-2059 model scenarios	See readme (FDCHN_README) at Z:\MODEL\FDCHN\
→Input	All input files needed for Reach 8-1 2009 and 2010-2059 model runs	Follows the same format as the June 8th transmittal except biota and WQ inputs for each reach are stored separately under …\projections folder (instead of …\calibration)
→Output	Directory for FDCHN model outputs	…\Projection folder contains a folder for each reach that contains the current projection outputs and is set-up to receive outputs for future runs.

Please feel free to contact me with any questions or concerns.

Cc: John Haggard, General Electric (without enclosures)